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5 Attorneys for Non-Party LIOR RON

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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**
10

11 WAYMO, LLC,

12 Plaintiff,

13 vs.

14 UBER TECHNOLOGIES, INC;
15 OTTOMOTTO LLC; and OTTO TRUCKING
LLC,

16 Defendants.
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Case No.: 3:17-CV-00939 (WHA)

**DECLARATION OF JONATHAN
PATCHEN IN SUPPORT OF NONPARTY
LIOR RON'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Honorable William Alsup

1 I, JONATHAN PATCHEN, declare as follows:

2 1. I am a partner in the law offices of Taylor & Patchen, LLP, a member in good
3 standing of the bar of the State of California, and am admitted to practice before the United States
4 District Court for the Northern District of California. I have personal knowledge of the matters set
5 forth in this declaration, and if called upon to testify as a witness in this case, I could and would
6 testify competently under oath to all of the matters set forth in this declaration.

7 2. This declaration is submitted in support of Nonparty Lior Ron's Administrative
8 Motion to File Under Seal confidential information in his Opposition to Waymo's Letter Brief re:
9 Diligenced Employees' Attorney-Client Privilege in Materials Provided to Stroz Friedberg
10 ("Opposition").

11 3. Specifically, Mr. Ron's Opposition contains information, highlighted in yellow at
12 pages 2, 4, 5, and 6 that make reference to materials designated as "Confidential" and/or "Highly
13 Confidential" by Defendants, Anthony Levandowski, and/or other third parties to this action.
14 These materials are attached as Exhibits 3 and 5 to Waymo's Letter Brief, filed under seal at Dkt.
15 1743-7, 1743-9.

16 I declare under penalty of perjury, under the laws of the United States of America, that the
17 foregoing is true and correct. Executed this 25th day of September, 2017, at San Francisco,
18 California.

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20 /s/ Jonathan A. Patchen
21 JONATHAN A. PATCHEN
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